

**REMARKS**

Claims 1-10 remain pending in the application.

**Objection to the Drawings**

The Office Action objected to the Figures 1 and 2 as allegedly lacking a legend of "Prior Art".

Figures 1 and 2 are clearly disclosed within Applicant's specification as being embodiments of the Applicant's invention, i.e., Figures 1 and 2 are **NOT** prior art.

**Objection of the Disclosure**

The Office Action objected to the Applicant's disclosure at page 12, line 29. In particular, the Examiner alleged that "Fig. 4" should be "Fig. 5". Applicant's disclosure at page 12, line 29 is amended herein to correct any informalities.

The Office Action objected to the Applicant's Brief Description of the Drawings. In particular, the Examiner alleged that Figures 1 and 2 should be labeled as Prior Art. As discussed above, Figures 1 and 2 are clearly disclosed within Applicant's specification as being embodiments of the Applicant's invention, i.e., Figures 1 and 2 are **NOT** prior art.

**Claims 1-10 over Havinis in view of Lam**

In the Office Action, claims 1-10 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,219,557 to Havinis ("Havinis") in view of U.S. Patent Application Publication No. 2003/0072318 to Lam et al. ("Lam"). The Applicant respectfully traverses the rejection.

Claims 1-10 recite a system and method of establishing a roaming interface between a home LCS manager of a home wireless carrier network and a visited LCS manager of a currently visited wireless carrier network.

Havinis appears to disclose a telecommunications system and method for enabling a General Packet Radio Service (GPRS) node, namely a Serving GPRS Support Node (SGSN) within a cellular network, to be able to

handle requests for Location Services (LCS) for a GPRS mobile station (MS) in parallel to other existing transactions such as delivering short messages or engaging in session management activity. Havinis fails to disclose or suggest any application to a wireless device while **roaming**, much less disclose or suggest a system and method of establishing a roaming interface between a home LCS manager of a home wireless carrier network and a visited LCS manager of a currently visited wireless carrier network as recited by claims 1-10.

The Office Action relied on Lam to make up for the deficiencies in Havinis to arrive at the claimed features. The Applicants respectfully disagree.

Lam's invention is directed toward sending data packets between various data networks across firewalls (Fig. 2). However, Lam fails to disclose or suggest any application to a wireless device while **roaming**, much less disclose or suggest a system and method of establishing a roaming interface between a home LCS manager of a home wireless carrier network and a visited LCS manager of a currently visited wireless carrier network as recited by claims 1-10.

Thus, even if it were obvious to modify Havinis with the disclosure of Lam, which it is not as discussed below, Havinis modified by Lam fails to disclose or suggest a system and method of establishing a roaming interface between a home LCS manager of a home wireless carrier network and a visited LCS manager of a currently visited wireless carrier network, as recited by claims 1-10.

Moreover, claims 1-10 recite a system and method of directing IP connectivity over the Internet capable of being transmitted through a firewall in a home wireless carrier network and through a firewall in a visited wireless carrier network.

The Office Action acknowledged that Havinis fails to disclose directing IP connectivity over an Internet capable of being transmitted through a firewall in a home wireless carrier network and through a firewall in a visited wireless carrier network (See Office Action, page 3). The reason Havinis fails to disclose a home wireless carrier network and a visited wireless carrier network is

that Havinis fails to disclose or suggest any application to sending information between a home wireless carrier network and a visited wireless carrier network.

The Office Action relied on Lam to make up for the deficiencies in Havinis to arrive at the claimed features. The Applicants respectfully disagree.

As discussed above, Lam fails to disclose or suggest any application to a roaming wireless device, much less to sending information between a home wireless carrier network and a visited wireless carrier network. Thus, Havinis fails to disclose a home wireless carrier network and a visited wireless carrier network, much less suggest a system and method of directing IP connectivity over the Internet capable of being transmitted through a firewall in a home wireless carrier network and through a firewall in a visited wireless carrier network, as recited by claims 1-10.

Thus, even if it were obvious to modify Havinis with the disclosure of Lam, which it is not as discussed above, Havinis modified by Lam fails to disclose or suggest a system and method of directing IP connectivity over the Internet capable of being transmitted through a firewall in a home wireless carrier network and through a firewall in a visited wireless carrier network, as recited by claims 1-10.

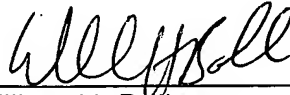
Moreover, modifying Havinis with Lam's disclosure is nonsensical. Lam's invention of sending data packets between various data networks across firewalls has nothing to do with Havinis' invention of handling requests for Location Services (LCS) for a GPRS mobile station (MS) in parallel to other existing transactions. Modifying Havinis to send data packets across data networks would not benefit Havinis' invention of handling requests for Location Services (LCS) for a GPRS mobile station (MS) in parallel to other existing transactions.

Accordingly, for at least all the above reasons, claims 1-10 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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